

BRAFMAN & ASSOCIATES, P.C.

ATTORNEYS AT LAW

767 THIRD AVENUE, 26TH FLOOR

NEW YORK, NEW YORK 10017

TELEPHONE: (212) 750-7800

FACSIMILE: (212) 750-3906

E-MAIL: BBRAFMAN@BRAFLAW.COM

BENJAMIN BRAFMAN

ANDREA ZELLAN

JOSHUA D. KIRSHNER

JACOB KAPLAN

TENY R. GERAGOS
ADMITTED IN NY AND CA

MARK M. BAKER
OF COUNSEL

MARC AGNIFILO
OF COUNSEL
ADMITTED IN NY AND NJ

February 8, 2019

VIA ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al., 18 Cr. 204 (NGG)

Dear Judge Garaufis:

Based on this Court's Order at the February 6, 2019 Status Conference, counsel informed Mr. James Q. Walker, counsel to the trustee, that the Court believes it is helpful and appropriate for the Government to receive a redacted version of the Trust Indenture and the January Declaration. (2/6/19 Transcript at 4.) Counsel provided Mr. Walker with both the Court's Minute Order and the Transcript of the Proceedings. After reviewing the Transcript and the Order, Mr. Walker has informed counsel that he does not object to the disclosure of the documents in the redacted form. He further informed counsel that the redacted declaration and redacted trust document reinforce the information he provided to the Government over two phone calls last year.

Accordingly, Counsel will promptly provide these documents in a redacted form to the Government.

Respectfully submitted,

/s/
Marc Agnifilo
Teny Geragos

cc: All Counsel (via ECF)